

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION

United States Courts
Southern District of Texas
FILED

July 11, 2023

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

v.

DWAYNE GERLOFF

§
§
§
§
§

CRIMINAL NO. **L-23-CR- 818**

DS

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or about **June 13, 2023**, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

DWAYNE GERLOFF,

did knowingly conspire and agree with other persons known and unknown to the grand jurors, to transport and move and attempt to transport and move within the United States by means of transportation and otherwise, an alien who had come to, entered, and remained in the United States in violation of law, in furtherance of such violation, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) and (v)(I).

COUNT TWO

On or about **June 13, 2023**, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

DWAYNE GERLOFF,

knowing and in reckless disregard of the fact that REINA PEREZ GOMEZ, was an alien who had come to, entered, and remained in the United States in violation of law, did transport and move and attempt to transport and move such alien, within the United States, by means of transportation

and otherwise, in furtherance of such violation of law, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii).

A TRUE BILL:

ORIGINAL SIGNATURE ON FILE

ALAMDAR S. HAMDANI
UNITED STATES ATTORNEY



Gerard Cantu
Assistant United States Attorney

USA-74-24b
(Rev. 6-1-71)

CRIMINAL DOCKET L-23-CR- 818

LAREDO DIVISION

NO. _____

FILE: 23-03879
INDICTMENT

MAG#: 23-01173
Filed: July 11, 2023

Judge: **DS** _____

UNITED STATES OF AMERICA

ATTORNEYS:

VS.

ALAMDAR S. HAMDANI, USA
GERARD CANTU, AUSA

DWAYNE GERLOFF

CHARGES:

- Count 1: Conspiracy to transport an undocumented alien within the United States
[8 USC 1324 (a)(1)(A)(ii) and (v)(I)]
- Count 2: Transport and Attempt to transport an undocumented alien within the United
States for financial gain
[8 USC 1324(a)(1)(A)(ii)]

TOTAL COUNTS: 2

PENALTY:

Counts 1-2: 0 to 10 years and/or \$250,000 Fine, \$100 special assessment,
\$5,000 special assessment, not more than a three (3)-year term of
supervised release [Each Count]